05-44481-rdd Doc 21778-11 Filed 12/23/11 Entered 12/23/11 17:35:02 Exhibit K Pg 1 of 37

EXHIBIT K

California C.

WEINSTEIN TIPPETTS & LITTLE LLP

7660 Woodway, Suite 500 Houston, TX 77063

Ph:(713) 244-0800

Fax:(713) 244-0801

Mr. James	G. Denau		aly 11, 2011
Delphi Co	rperation		Section of the sectio
	hi Drive, M/C 483-400-554		
Troy, MI			
48098-281	5	File#:	2012
272-222-22		**	NUTRIEN
ATTN	Mr. James G. Derian	Inv #:	2653

RE:

Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC,

et al.

DATE	DESCRIPTION	HOURS	AMOUNT	Thereser
Jun-02-11	Draft detailed letter to plaintiffs? counsel concerning bankruptcy bar and seeking consensual dismissal of lawsuit.	0.70	236.25	KRW
Jun-03-11	Meeting with attorney K. Worley to review draft letter to plaintiffs' counsel regarding dismissal due to bankruptey issues. Memo to plaintiffs' counsel regarding same. Review and respond to plaintiffs' memo regarding discussing same 6/6/11. Client memo regarding plaintiffs' counsel reference to K. Smith counsel contact and victory on bankruptcy issue. Review and respond to J. Derian memo	0.80	270.00	DBW
	Receipt and review of correspondence from J. Derian concerning subpoena to GM from plaintiffs; return correspondence concerning status of same; conference with D. Weinstein concerning drafting motion to dismiss due to bankruptcy bar; draft detailed motion to dismiss plaintiffs' claims due to disallowance by bankruptcy court.	2.40	810.00	KRW

Invoice #:	2653 Page 2			July 11, 2011
Jun-06-11	Meeting with attorney K. Worley to discuss revisions to letter and motions to plaintiffs' counsel in light of recent strategic discussions with client regarding plaintiffs' counsel's failure to reply to client's objection to admin claim.	0.20	67.50	DBW
	Conduct extensive revisions to motion to dismiss plaintiffs' claims due to bankruptcy bar and supporting affidavit of D. Unrue; conduct extensive revisions to correspondence to plaintiffs' counsel seeking consensual dismissal due to bankruptcy bar, finalize motion to dismiss, supporting affidavit, and correspondence seeking consensual dismissal; multiple memos to D. Weinstein concerning all above.	3.00	1,012.50	KRW
Jun-07-11	Counsel memo regarding resetting GM deposition for June 17.	0.10	33.75	DBW
	Multiple memos from D. Weinstein concerning deposition of GM corporate representative on 6/17, return memos concerning same; memo to J. Derian concerning status of subpoena by plaintiffs to depose GM representative; correspondence to counsel for Enterprise concerning deposition of GM representative.	0.40	135.00	KRW
Jun-08-11	Staff memos regarding GM deposition and client impact regarding PODs documents.	0.10	33.75	DBW
	Review plaintiffs' revised notice of GM corporate representative deposition. File notes regarding topics.	0.10	39.75	DBW
	Correspondence to counsel for Enterprise concerning receipt of subpoena for deposition of corporate representative on 6/17 and further handling; draft memo to file concerning plaintiffs' request for deposition of former Delphi engineer J. Jackson and subsequent conference with J. Jackson.	0.60	202.50	KRW
Jun-09-11	Review and revise letter to plaintiffs' counsel, client's motion to dismiss and D. Unrue affidavit regarding bankruptcy dismissal and claim bar. Memos with attorney K. Worley regarding next steps regarding finalizing same.	0.50	168.75	DBW

Invoice #:	2653	Page 3			July 11, 2011
	with coun	D. Weinstein concerning of sel for GM discussing deporate representative and version 6/22.	osition of	67.50	KRW
Jun-10-11	needed re plaintiffs' and verific	with J. Derian to discuss st view of draft corresponder counsel and draft motion cation of D. Unrue affidav a with attorney K. Worley	ice to to dismiss it.	67.50	DBW
	bankrupte Unrue, and dismissal; representa counsel fo same; cond concerning GM repres	vise draft motion to dismity bar and supporting, affid I letter seeking consensual review subpoena for depotive to prepare for confere GM and Enterprise concernce with counsel for Q 16/22 inspection and depotentative; memo to D. Well same; receipt and review tos from counsel for Enterprise for Counsel for Enterprise distributions.	avit of D. I sition GM nce with erning M sition of instein of color	0 506.25	KRW
Jun-11-11	memo regi regarding (representat	d respond to attorney K. Varding conference with GN cancellation of GM corpor ive deposition and regard M inspection of vehicle an support.	A counsel ate ing	0 67.50	DBW
·		urt's scheduling order and deadlines. Staff memos re		67.50	DBW
Jun-13-11	plaintiffs* Delphi doe regarding c and draft d counsel and Delphi atte	with attorney K. Worley threat to file motion to cor sn't produce documents at lient's approval of sendin ismissal motion to plaintif regarding client's approvidance with WTL course 12/11 vehicle inspection.	npel if id g letter is' /al of	101.25	DBW
	counsel con compel on memo to D conference	I review of memo from placeming threatened motion multiple discovery respon. Weinstein concerning sa with counsel for plaintiffs same; memo to D. Weins	n to ses: me:	168.75	KRW

Invoice #:	2653	Page	4		Ju	y 11, 2011
	concerning further har	g conference with pla idling.	intiffs and			
Jun-14-11	memos reg plaintiffs'	d respond to attorney arding 6/22/11 vehic threatened motion to garding motion for di	le inspection, compel, and	0.20	67.50	DBW
	second, an determine responses a conference response ti compel; dr strategy for address con Delphi's di strategy for complaints concerning vehicle on same; detai plaintiffs' t conference	scovery requests from d third sets of discovery future strategy for sures requested by plaint with local counsel comeline for potential reaft detailed file memoral supplementing discouplaints plaintiffs mascovery responses; desponding to plaint; conference with A. availability for inspect/22; memo to J. Derial hreatened motion to with F. Peterson conto plaintiffs' threatened to plaintiffs' threatened.	ery to Delphi to oplemental iffs' counsel; oncerning notion to o concerning overy to due related to etermine future iffs' discovery Curtis cution of ian concerning n concerning compel; cerning	3.00	1,012.50	KRW
Jun-15-11	canceling 6 agreement deadlines b	I counsel memo rega /17 deposition and se to extend all expert d y 60 days. Memo to a arding same.	eking sclosure	0.10	33.75	DBW
Jun-16-11	dismissal is issues and p	th J. Derian to review sues, 6/22/11 vehicle plaintiffs' motion to c with attorney K. Wo rding same.	inspection ompel.	030	101.25	DBW
	with J. Deri further hand concerning deadlines; n concerning return memo with J. Deri	D. Weinstein concern an to discuss case sta lling; correspondence agreement to extend nemo from counsel for Delphi's discovery re to concerning same; concerning same; con and D. Weinstein smiss, plaintiffs' three	fus and to all counsel expert or plaintiffs sponses; onference concerning	0.70	236225	KRW

Invoice #:

2653

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July 11, 2011

KRW

motion to compel, and attending inspection of the subject vehicle.

Jun-17-11

Memo to plaintiffs' counsel coordinating conference to discuss discovery issues; prepare for conference with counsel for plaintiffs to discuss discovery complaints; draft follow up correspondence to counsel for plaintiffs concerning agreements made related to plaintiffs discovery complaints; memo to D. Weinstein concerning same; determine status of documents prepared for production in response to plaintiffs' third set of document requests; conference with D. Weinstein concerning revisions to correspondence to plaintiffs related to plaintiffs' discovery complaints; review/revise correspondence to plaintiffs; coordinate sending letter to counsel for plaintiffs; conference with A. Curtis concerning whether additional documents could be searched for in response to plaintiffs' discovery complaints; determine further handling, strategy, and future action items: memo to D. Weinstein concerning strategy and future action items.

Jun-19-11

Draft detailed and lengthy file memo concerning potential supplemental discovery responses; in-depth review of voluminous validation and verification testing documents prepared by A. Curtis in response to plaintiffs' first requests for production No. 59 for use in determining strategy for producing to plaintiffs; detailed memo to A. Curtis concerning issues identified with document production and further handling; memo to D. Weinstein concerning strategy for response to plaintiffs' discovery complaints; memo to J. Derian concerning future action items and finalizing response to plaintiffs' discovery complaints; memo to D. Weinstein concerning. vehicle inspection on 6/22.

Jun-20-11

Conference with A. Curtis concerning supplemental responses to plaintiffs' discovery requests; detailed memo to D. Weinstein concerning production of verification and validation data; receipt and review of memo from D. Weinstein concerning same; preparation of documents for production;

1,012,50

3.00

4.50

1,518.75

KRW

3.70 1.248.75 KRW

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July 11, 2011

conference with D. Weinstein concerning same; conference with A. Curtis concerning same; conference with B. Frantangelo concerning same; memo to J. Derian concerning all above; memo to counsel for plaintiffs concerning production of Delphi documents; memo to J. Derian concerning document production; memo from J. Derian concerning same; conference with D. Nunan concerning attending 6/22 vehicle inspection: conference with P. McDaniel concerning same; memo to D. Weinstein concerning vehicle inspection; memo to counsel for Enterprise concerning vehicle inspection; draft memo to J. Derian concerning supplemental discovery responses.

Conference with attorney K. Worley regarding attendance at vehicle inspection, status of discovery, plaintiffs' defect theory, and discussions with Delphi engineer, D. Nunan, regarding availability of PODS equipment for analysis.

Jun-21-11

Memos with attorney K. Worley regarding vehicle inspection and document production updates.

Review numerous memos from attorney K. Worley regarding client's supplemental document production and discussions with plaintiffs' counsel regarding same. Lengthy strategy conference with attorney K. Worley regarding same. File notes regarding same.

Correspondence from D. Numan concerning 6/22 vehicle inspection; conference with J. Derian concerning 6/22 vehicle inspection; memo from J. Derian concerning 6/22 vehicle inspection; memo to counsel for Enterprise concerning attending 6/22 vehicle inspection; correspondence to A. Curtis concerning production of validation and verification testing; receipt and review of memo from counsel for Enterprise concerning change in address for vehicle inspection; memo to D. Nunan and P. McDaniel concerning same; lengthy conference with A. Curtis concerning production of documents included in validation testing folder; receipt and review

0.50 168.75 PRM

0.10 33.75 DBW

0.80 270.00 DBW

3.30 1.11375 KRW

Invoice #:

Jun-22-11

2653

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**			
memo concerning same; detailed memo to B. Frantangelo concerning documents to remove from document production and re-numbering documents; review additional documents to be produced; draft correspondence to plaintiffs' counsel concerning Delphi's supplemental discovery responses; conference with P. McDaniel concerning vehicle inspection on 6/22; memo from D. Weinstein concerning re-numbering document production following removal of certain documents; memo to J. Derian concerning same; conference with D. Weinstein concerning supplemental responses to plaintiffs' discovery requests.			
Prepare for upcoming vehicle inspection by reviewing color photographs of subject vehicle; prepare memo to D. Nunan regarding attendance at upcoming vehicle inspection.	030	101.25	PRM
Review staff memos summarizing interrogatory responses of plaintiffs. Staff memo regarding follow-ups from same.	0.30	101.25	DBW
Staff memos regarding strategy for ordering most relevant medical records and seeking cost sharing of same with co-defendants.	0.10	33.75	DBW
Receipt and review of correspondence from B. Frantangelo concerning preparation of documents responsive to plaintiffs' third requests for production; receipt and review of correspondence from counsel for GM concerning production of GM verification documents; conference with B. Frantangelo concerning re-numbering GM verification documents; draft memo to J. Derian concerning Delphi's responses to plaintiffs' interrogatories No. 22 and 25; draft detailed correspondence to counsel for plaintiffs concerning agreements on discovery disputes; determine strategy for and draft individual responses to each of plaintiffs twelve requests for supplementation; memo to D. Weinstein sending draft correspondence.	2.40	810.00	KRW
Continue preparation for vehicle inspection, including review of accident report and discovery responses; attend vehicle inspection and conference with D. Nunan and counsel and	6.00	2,025.00	PRM

Invoice #:	2653	Page 8		Ju	ly 11, 2011
	Maryland and Gene	or Enterprise RAC Company of , LLC, Rockmont Motor Company, ral Motors; prepare notes of ons during vehicle inspection.			
	regarding summarie vs. summ Weinsteir	nd review memo from D. Weinstein status of deposition transcript s; review file for transcripts received aries prepared; memo to D. and K. Worley detailing list of s still needed.	0.10	11.70	MPP
Jun-23-11	counsel re Memo to review att	nd revise draft letter to plaintiffs' garding discovery dispute status, attorney K. Worley regarding same, orney P. McDaniel memo regarding recent vehicle inspection.	0:30	101.25	DBW
	Weinstein of validati receipt and B. Frantar of docume particular for use in sending docurrespond sending D memo to J correspond supplement conference plaintiffs strategy fo with J. De	concerning issues with production on and verification documents; I review of CD of documents from agelo; conduct in-depth review of CD ents sent by Delphi to determine requests the documents respond to drafting correspondence to plaintiffs ocuments; draft detailed lence to counsel for plaintiffs elphi documents; draft detailed. Derian seeking approval for lence to plaintiffs related to Delphi's stal discovery responses; office with F. Peterson concerning threatened motion to compel and repotential response; conference rian concerning Delphi's stal discovery responses.	3.50	1,181.25	KRW
	observatio memo to a discussion	e with attorney K. Worley regarding us at vehicle inspection; prepare ttorney D. Weinstein regarding is at vehicle inspection and n of protocol for removal of SDM.	0.20	67.50	PRM
		cuments to produce in response to hird request for production.	0.50	58.50	MPP
Jun-24-11	finalizing l	e with J. Derian concerning etter to plaintiffs regarding Delphi's esponses; review/revise/finalize	1.00	337.50	KRW

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correspondence to plaintiffs' counsel
concerning supplemental discovery responses;
coordinate sending correspondence to
plaintiffs; detailed memo to F. Peterson
concerning supplemental discovery responses
and future action items.

1-27-	

Review plaintiffs' memo to all counsel regarding EDR downloading. Memo to D. Nunan regarding thoughts on same.

0.10 33.75

DBW

DBW

Jun-28-11

Review and respond to plaintiffs' counsel memo regarding arranging Mrs. Averbukh deposition 8/15-16/11. Review and respond to D. Nunan memo with thoughts on recent counsel memos regarding difficulty of downloading subject SDM.

0.30

0.30

101.25

⁵101.25

PRM

Receipt and review of memo from plaintiffs¹ counsel regarding removal of SDM from subject vehicle and download of information; review and respond to memos from attorney D. Weinstein and D. Nunan regarding protocol for removal of SDM and download of information.

Unadjusted Balance (UB)

47.60 \$15,932.70

Balance Due (90% of UB per agreement)

\$14,339,43

*Amount claimed in Motion does not reflect adjustment because 10% difference was paid on later invoice.

Jun-07-11	Certified copy of transcript and word index provided by Legal ink, Inc certified copy of transcript and word index of J. DeRose		110:00
Jun-20-11	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Hotel		145.77
	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Rental Car	55	138:06
	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Gas for Rental Car		10.76
	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Lunch at Airport		18.89
	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Airfare		927,90

Totals

\$1,351.38

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2653

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July 11, 2011

Total Fce & Disbursements

\$15,690.81

Total amount claimed in Motion after disregarding 10% adjustment:

TAX ID Number

26-2022982

\$17,284.08

Mr. James G. Derian

Name	TIMEKEEPER SUMMARY		Hours	Rate	Amount
David B. Weinstein		(30	,\$ 337.	50	\$1,788.75
Katheryne Worley		4,40	\$337.	50	\$11,610.00
Philip McDaniel	· · · · · · · · · · · · · · · · · · ·	30	\$337,	50	\$2,463.75
Maggie Peroni	30	.60	\$117.	00	\$70.20

Sedgwid OPH

WEINSTEIN TIPPETTS & LITTLE LLP

7660 Woodway, Suite 500 Houston, TX 77063

Ph:(713) 244-0800

Fax:(713) 244-0801

Mr. James	G. Derian	Aug	ust 8, 2011
Delphi Cor	rporation	-	The second of th
	hi Drive, M/C 483-400-554		
Troy, MI	restate was to the end admitted of the end of	•	
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valunders var Jams	MANUS MISS STRANG STORM MISS	File#:	2012
ATTN:	Mr. James G. Derian	Inv #:	2707

RE:

Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC, et al.

C 22 Profession 1900

DATE	DESCRIPTION	HOURS	AMOUNT	THIMEREDENER
Jul-08-11	Review plaintiffs' memo requesting A. Curtis deposition in mid-August. File review regarding status of deposition requests. Memo back regarding same. Memo to attorney K. Worley regarding same.	0.20	67,50	DBW
Jul-12-11	Receipt and review of memo from D. Weinstein concerning future action items following plaintiffs' request for deposition of A. Curtis.	0.20	67.50	KRW
Jul-13-11	Meeting with attorney K. Worley to review status of plaintiffs' request for deposition of A. Curtis and open issues regarding dismissal motion and possible settlement overture. Conference with J. Derian regarding same.	0.40	135.00	DBW
	Conference with A. Curtis concerning deposition requested by plaintiffs' counsel; conference with D. Weinstein concerning case status and further handling, plaintiffs' request for deposition of A. Curtis, and future action items; conference with D. Weinstein and J. Derian concerning future action items; memo to D. Weinstein concerning scheduling	1.90	641.25	KRW

Invoice #:	2707		Page	2		Aug	ust 8, 2011
	depositio provide d	n of A. Curtis a eposition dates	nd agre to plai	ement to ntiff.			
Jul-14-11	Worley re	vith local counse garding plaintif ce as relevant to	Ts' atto	mey first	0.10	33.75	DBW
·	availabili staff and i Review p	i. Curtis memos ty end of Augus attorney K. Wor laintiffs' filing i al" counsel.	t 2011. ley reg	Memos with arding same.	0.30	101.25	DBW
	of plaintif items; loc Kuhlman correspon schedulin counsel co Derian co conduct of plaintiffs; responses J. Derian of Weinstein attorneys; same; mer obtaining	ce with J. Deriains is attorneys properly atterneys properly atterneys properly in the following same; needing obtaining obtaining obtaining same; needing same; needing same; needing obtaining obtaining same; concerning same concerning plainemo from J. I no to local country probate documenceming same.	o hac von first and record to memo ing probasis' discountiff A Derian isel con set on the control of the contro	ice and other t contact with eview of concerning plaintiffs' from I. bate records; te records of overy ds; memo to to to D. Averbukh's concerning	1.60	540.00	KRW
Jul-15-11	light of pla inadverten co-defenda plaintiff/de	staff memo reg sintiffs' request t airbag deployr ints' notice of d rendant A. Ave Worley regard	for dat nents. epositi rbukh.	a on Review on of Memos with	0.20	67.50	DBW
	plaintiffs' information deployment same; return same; ment for responding requests; redeposition multiple musame; deter	e with G. Greib discovery requent on field incidents; memo to G. memo from J. Derian coling to plaintiffs accipt and review of Mrs. A. Average of Mrs. Average of Mrs. A. Average of Mrs. Average of Mrs. Average of Mrs. Aver	st seek ints in Greib Deria oncern disco w of no bukh; ounsel ion iter	ing inadvertent concerning n concerning ing strategy ivery otice of review concerning ms for	1.50	506.25	KRW

	i				:	
Invoice #:	2707	Page	3		Aug	ust 8, 2011
	concerning c	quests, conference ase status and futu Weinstein concern	re action items;			
Jul-18-11	Weinstein co plaintiff A. A concerning a concerning a Averbukh; m attending der on 8/15; men scheduling de representative memo from J A. Averbukh plaintiffs' fire supplemental requests for p	review of memo francerning retention averbukh; memo to J. Detention of attorney emo to D. Weinstoposition of plaintiff to from D. Weinstoposition of Delphie; return memo con Derian concerning draft supplemental interrogatories; of responses to plain reduction; draft supplemental interrogatories; of the production; draft supplemental interrogatories; of the production; draft supplemental interrogatories; of the plaintiffs' second reduction; draft supplemental interrogatories; of the plaintiff second reduction; draft supplemental interrogatories; of the plaintiff second reduction; draft supplemental interrogatories; of the plaintiff second reduction; draft supplemental reduction; dra	of counsel by to D. Weinstein Perian ys by A. ein concerning f A. Averbukh ein concerning i meerning same; ag deposition of all responses to draft hiffs' first applemental	3.00	1,012-50	KRW
Jul-19-11	Memo to cou same. Numer	e of A. Averbukh onsel regarding arra ous client, counse ling deposing And	ingements for I and staff	0.30	101.25	DBW
Jul-20-11	regarding plac	espond to J. Deriai se to present A. Cu arther memos rega	ırtis for	0.20	67.50	DEW
Jul-21-11	regarding sam Worley regard	te file and local co te. Memos with at ling follow-up to s us of supplemental	torney K. ame and	0.20	67.50	DBW
Jul-22-11		iffs' fourth request to client. Memos arding same		0.10	33.75	DBW
	Delphi's supp plaintiffs' first for production; co production; co plaintiffs cone discovery resp concerning sta	ith A. Cturis conce lemental discovery interrogatories, fi , and second reque inference with cou eming due date for onses; memo to J. tus of supplementa- cipt and review of	responses to rst requests ests for used for r supplemental Derian al discovery	1.40	472.50	KRW

Invoice#:	2707	Page	4		Aug	ust 8, 2011
	memo to A. i additional di conference to	its for production t Curtis and J. Deria scovery requests a discuss potential ntially responsive o	n sending od coordinating objections and		à.	
Jul-24-11		ition for A. Curtis' ental interrogatoric		030	101.25	KRW
Jul-25-11	concerning of document pro	ondence to counse onfidentiality agree oduction; memo to spondence for rev	ement prior to J. Derian	0.80	270.00	KRW
Jul-26-11		evise client's draft olaintiffs' interrogi		0.30	101.25	DBW
680		43.500,000 8.0 4.0	resentative	0.10	33.75	DBW
	obtaining app interrogatory corresponden supplemental	rith J. Derian concerval of suppleme responses; receipt ce from J. Derian a discovery responsuests, and addition	erning ntal and review of concerning es, new	0.50	168,75	KRW
3Jul-27-11	to requests for memo from I provision of It review/revise generally prov Derian concer	production and in Derian concerning MDA related to rec discovery responsitions of MDA; making same; return guage for response No. 25.	terrogatories; g production of ords retention; e to reflect temo to J. memo	2.10	708.75	KRW
Jul-28-11	Curtis concern requests; leng and A. Curtis requests for pi	nference with J. D ling responses to d thy conference wit to discuss plaintiff oduction, potentia v responsive docur	iscovery h J. Derian s' fourth I objections,	1.70	<i>573.15</i>	KRW
	Unadjusted I	Balance (UB)	•	17.40	\$5,872.50	
	Balance Due	(90% of UB per a	greement) *		\$5,285.25	

^{*}Amount claimed in Motion does not reflect adjustment because 10% difference was paid on later invoice.

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Invoice #: 2707

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August 8, 2011

DISBURSEMENTS

Jul-01-11

FedEx delivery 06/24/11 to B. Kuhlman with

29.35

The Kuhlman Law Firm

Jul-06-11

Professional services rendered by Bacon,

30.00

Thornton & Palmer, L.L.P.

Totals

\$59.35

Total Fee & Disbursements

\$5,344,60

Total amount claimed in Motion after disregarding 10% adjustment TAX ID Number 26-2022982 and subtracting \$30 Bacon invoice: \$5,901.85 Mr. lames G. Denan

Name	TIMEKEEPER S		Hours R	ite Amount
	6 5	yana da kana aya kana ka kana ka ka		
David B. Weinstein	-8 g	2.40	\$337,50	3810.00
Katheryne Worley		15.00	\$337.50	\$5,062,50

Stowick FRH

WEINSTEIN TIPPETTS & LITTLE LLP

7660 Woodway, Suite 500 Houston, TX 77063

Ph:(713) 244-0800

ক্তিক্রেম্বর্কের ইত্যালয়ের ও জে । ও জেগ হয় এবং

Fax:(713) 244-0801

Mr. James G. Derian September 12, 2011

Delphi Corporation
5825 Delphi Drive, M/C 483-400-554

Troy, MI
48098-2815

File #: 2012

ATTN: Mr. James G. Derian

September 12, 2011

File #: 2011

RE:

Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC,

et al.

DATE	DESCRIPTION	HOURS	AMOUNT	TIMEKEEPER
Aug-02-11	Conference with counsel for Enterprise/GM concerning deposition of GM representative, Alla Averbukh, production of Delphi documents, and strategy for filing motion for non-sharing protective order; conduct initial legal research for motion for non-sharing protective order.	0.80	270.00	KRW
Aug-03-11	Review and respond to attorney K. Worley memo regarding status of drafting protective order and running past local counsel first.	0.10	33.75	DВW
	Receipt and review of memo from A. Curtis concerning searching for documents in response to plaintiffs' 4th requests for production; draft return memo concerning same; conduct in-depth legal research to locate Maryland law on permissibility of non-sharing protective orders; review Maryland Rule of Civil Procedure 2-403 and case annotations to same for use in drafting motion for entry of non-sharing protective order; draft motion for non-sharing protective order; memo to D. Weinstein concerning all above.	3,50	1,181.25	KRW
Aug-05-11	Review/respond to attorney K. Worley memo	0.20	67.50	DEW

Invoice #:	2718	Page 2		Septemb	er 12, 2011
·	plaintiffs' Memos w	EDR download request from counsel and protocol for same, ith attorney K. Worley regarding order provisions and strategy for a			
	concerning download	e with counsel for GM/Enterprise g plaintiff's proposed EDR and future action items; memo with D. Weinstein and coordination g above.	0.40	135,00	krw
Aug-08-11	Worley reg	th defense counsel and attorney K. parding arrangements for plaintiff A. s 8/15/11 deposition.	0.10	39.75	DBW
	non-sharin citations ar conference	merous cases cited in motion for g protective order to confirm id prepare for filing with the court; with counsel for plaintiffs issues in dispute for use in	2:20	742.50	KRW
	finalizing r order; men finalizing f protective (above; men	notion for non-sharing protective no to D. Weinstein concerning or filing motion for non-sharing order; return memo concerning all no to F. Peterson concerning non-sharing protective order.	secular di	in the second	集 都
Aug-09-11	motion for review/revi protective of concerning concerning	eview of legal authority cited in non-sharing protective order; se/finalize motion for non-sharing order; memo from F. Peterson same; memo to D. Weinstein same; memo to J. Derian sending non-sharing protective order for approval.	1.90	641.25	KRW
Aug=10-11		a attorney K. Worley regarding ent's proposed protective order.	0.10	33,75	DBW
	Derian conc non-sharing motion for r review/revis the Court ;c Enterprise/C for entry of memo to J. I	review of correspondence from J. erning revisions to motion for protective order; review/revise non-sharing protective order; se protective order to be entered by orrespondence to counsel for M concerning proposed motion non-sharing protective order; Derian concerning finalizing and or for non-sharing protective order.	1.10	371.25	KRW

Invoice#:	2718	Pa	ge	3			Septemi	per 12, 201	1
Aug-I1-I1	motion for exchange motion with review entering for use in date for referencements concerning concerning	counsel for GM/E non-sharing protecting finalization counsel for GM dof line test data determining production; memo to D same; memo to g production of ensisted by A. Cu	ect ing I/E sen icti I/S I/V I/I d o	ive order; memo cand filing nterprise; t by A. Curlis on; confirm due fourth requests instein erian f line test data	0.80	9	270.00	KRV	V
Aug-12-11	materials in use plaintivehicle Al August 15 memos confile material examiner in photos for analysis of Alla Avert GM/Enterpon-sharin Weinstein motion for	n-depth review of needed to prepare of defendant and of la Averbukh in Bit coordination, concerning preparations including police cords, deposition deposition of Alla potential areas of pukh; memo to coorise concerning I g protective order concerning finalization-sharing protective order	for living the living	deposition of er of subject more, MD on ences, and of numerous ecords, medical anscripts, and verbukh; estioning of el for ihi's motion for emo to D. and filing ve order.	2.90	President S	9 78 9 5	KRW	9
	Compile do letter and f	ocuments produce orward to Enterpr	d b ise/	y Delphi; draft GM.	1.30	1	52.10	MPP	Ğ.
Aug-14-11	requests for responses; and Jim De plaintiffs' r and additio questioning draft outlin	nses and objection production; reviewed draft responsion, review polices ponses to disconal file materials for deposition of cof deposition quentials and and Alla Aver	ew/ es er ver Al Al est	revise draft to Andy Curtis sport, y, pleadings, repare la Averbukh; oning for	3,00	1.0	12.50	KRW	
Aug-15-11	responders Fitzpatrick, and scene w preparing fo conduct fine Alla Averba including ac	osition testimony Quintina Walker, Eboni Robinson, vitness Leonard Pror deposition of A al preparations for labinore I lditional review of edical examiner redical examiner redi	Surath The Illa de Vian I'fi	zanna omas Potter, er for use in Averbukh; position of yland le materials	4.00	1,38	50.00	KRW	

j.						
Invoice#:	2718	Page	4		Septemb	er 12, 2011
		S records, and addition revisions to draft dep			٠	
	conferences status and fi with counse	osition of Alla Averbi with counsel concer uture action items; co I for co-Defendants (oncerning further har	ning case nferences 3M and	6.00	2,025.00	KRW
	Maryland le	ncy K. Worley in ider gal standards for app culation of damages.	ortionment of	0.20	23,40	MPP
Aug-16-11	Meeting wit Alla Averbu strategy in li	h attorney K. Worley kh deposition 8/15/1 ght of same.	to review I and discuss	0.50	168.75	DBW
·	Follow-up n regarding pr	nemos with attorney l otective order motion	C. Worley issues	0.10	33.75	DBW
	deposition of further hand receipt and receipt and receipt and receipt and receipt and responses; recorresponder discovery respondering sometion for no local countexchange counter A. Curtis of	with D. Weinstein co f Alla Averbukh, cast ling, and future action eview of corresponderning status of discoviceipt and review of ace from J. Derian corponses; return correstant; review/revise/fion-sharing protective sel concerning same; ordinating filing of meaning responses.	e status, i items; ince from A. very incerning pondence inalize order; memo memo otion; memo	.1-70	573.75	KRW
Aug-17-11	Averbukh de	nounchon. ney K. Worley client position. Memo to at ding follow-ups.	report on A. torney K.	0.10	33.7 5	DBW
	Averbukh; m same; confere Delphi's resp for production in response; re J. Derian com Averbukh; me	ry of deposition of Alemo to J. Derian consence with A. Curtis consess to plaintiffs' the sand production of eccipt and review of cerning deposition of the cerning deposition of the certial early resolution to D. Weinstein tential early resolution	cerning concerning ind request documents memo from Alla concerning	2.20	742.50	KRW

Invoice#:	2718	Page	Š		Septemb	er 12, 2011
Aug=18-11	non-shari Derian co stipulation review/re third requ Curtis cor counsel co non-shari memo to l of non-ecc law and fi of correspond with A. Ca with local damages c receipt and local coun non-econo	nd review of file-staming protective order; in neeming proposed El a proposed by plainting vise draft responses to ests for production; in terming same; memo oncerning setting moting protective order for ocal counsel concernionomic damages cap at ture action items; recondence from A. Curto discovery responses lence concerning same counsel concerning same counsel concerning in ap and issues related review of corresponses concerning calculating damages cap and to memo concerning	nemo to J. DR download Ts; p plaintiffs' nemo to A. to local ion for r hearing; ing application under Maryland cipt and review its concerning s; return ie; conference ; conference to settlement; dence from ution of future action	2.30	776.25	KRW
Aug-19-11		th attorney K. Worley who outlining Frame.	Review local	0.30	101.25	DBW
	production documents previous disappropriate memo from	planning fourth rectoring to include Bates num previously produced; scovery responses to de Bates numbers for de D. Weinstein memo to J. Derian	juests for bers of review determine	1.00	337.50	KRW
Aug-22-11	with client, Long partne dismissal m issnes and c regarding call regardin	in preparation for con attorney K. Worley as r C. Haffey regarding otion issues, SDM/EI ontacting plaintiffs' a contacting plaintiffs' a g same. Post-confere y K. Worley regarding	nd Butzel bankruptcy OR download Itomey conference meeting	1.00	337/50	DBW

Invoice #:	2718	Page	6		Septemb	ет 12, 2011
	Memo to p	laintiffs' attorney	,		,	
	4	with plaintiffs* attorion	Report to	0.40	135.00	DBW
	Weinstein action item Weinstein plaintiffs' j EDR down medical ex	conference with J. concerning case states; conference with J proposed stipulation load, and possibility aminer; conference arm from deposition	us and future Derian and D concerning the of deposing with court	4.40	1,485.00	KRW
5	for use in o franscript; o sending plo attachment	btaining rough draft sorrespondence to co oto of A. Averbukh, to deposition of A. a se/finalize responses	of deposition our reporter exhibit 1, for Averbukh;			
	fourth reque coordinating to plaintiffs	ests for production; is geoncerning service fourth requests for onference with A. C	nemos and of responses production on	жi		. Σt
Aug.23-11	sending K. S	respond to client memory attornations of the counsel memory memory to client	ey C. Haffey.	0.20	67.50	DBW
	attendance a	ounsel and staff mer t GM corporate repr nd logistics for Delp	esentative	0.20	67.50	DBW
	order denyin K. Smith ma sending orde to J. Derian of GM represer concerning v	D. Weinstein conce g Delphi's motion to tter to C. Haffey; co r to C. Haffey as rec concerning attending tative; memo to cou thether deposition g sentative on August	o dismiss from prespondence prested; memo g deposition of unsel for GM oing forward	0.50	168.75	KRW

Review and respond to I. Derian memo regarding D. Nunan's advice to proceed with SDM download. Memo to attorney K. Worley

67.50

0.20

DBW

Aug-24-11

05-44481-rdd Doc 21778-11 Filed 12/23/11 Entered 12/23/11 17:35:02 Exhibit K Pg 23 of 37

Invoice #:	2718	Page	7		Septemi	per 12, 2011
	τegarding	next steps. Memo to) client			
	concernin counsel fo	nd review of memo fi g SDM download; co r GM concerning de tive and proposed SI	prespondence to position of GM	0.20	677.50	KRW
Aug-25-11	action item memo con memos fro action item return men Derian cor plaintiffs \ memo from deposition to trial sett memo from deposition conference EDR down	m D. Weinstein concust to obtain SDM do cerning same; review m D. Weinstein constant of concerning same; recently scheduling of admir and Aleksar n counsel for GM coof GM representativing; return memo con J. Derian concerning of plaintiffs; coordin with counsel for GM load; memo to J. Dedeposition of GM redeposition	wnload; return v additional cerning future aload of SDM; memo to J. depositions of adr Averbukh; neerning e cancelled due accrning same; ag scheduling ation of I concerning	0.70	236.25	KRW
Aug-26-11	Send memo \$900K dem send to clie	o to plaintiffs' attorne and, Review reply to nt.	y rejecting same and	0.10	33.75	DBW
	GM represe	with counsel for GA mative deposition be proposed SDM down	ing	0.50	168.75	KRW
	Review file items.	and draft checklist o	f future action	0.20	67.50	KRW
Aug-29-11	Curtis depor Conference deposition s	h attorney K. Worles sition arrangements a with A. Curtis regard cope, preparation and s. Client memo regard	ind strategy. ling d	0.80	270.00	DBW
	preparation 9/27; memo credit and no	with D. Weinstein co of A. Curtis for depo to file concerning se on-economic damage received from local of	sition on ttlement s cap	0.50	168.75	KRW

05-44481-rdd Doc 21778-11 Filed 12/23/11 Entered 12/23/11 17:35:02 Exhibit K Pg 24 of 37

Invoice #:	2718	Page	8		Septemb	er 12, 2011
Aug-30-11	concerning s	ence to counsel for status of obtaining I for Siemens to de hicle.	information	0.20	67.50	KRW
Aug-31-11	motion pack back regardi notes and file memos with draft propose	tel Long bankrupte age sent from J. D ng possible waiver a note regarding st J. Derian regardin ad letter to plaintif n-waiver by Delph	erian. Memo issue. Staff ime. More g same, and fs' counsel	0.60	202.50	DBW
	Receipt and a motion from	eview of bankrup J. Derian,	tcy dismissal	0.30	101.25	KRW
	Unadjusted	Balance (UB)		47.80	\$15,80 <u>L.75</u>	
ුර	Balanco Due	(90% of UB per	agreement) *	¥9 	\$14,221,58	

^{*}Amount claimed in Motion does not reflect adjustment because 10% difference was paid on later invoice.

DISBURSEMENTS

Aug-03-11	Professional services rendered by Bacon,	322.33
Aug-15-11	Thornton & Palmer, L.L.P. K. Worley travel to Baltimore, MD to attend	70.40
	deposition of plaintiff Alla Averbukh - Taxis to and from deposition location	
	K. Worley travel to Baltimore, MD to attend deposition of plaintiff Alla Averbukh - Taxi	20.00
	from Hobby Airport to Home	in the second
	K. Worley travel to Baltimore, MD to attend deposition of plaintiff Alla Averbukh - Meals	35.00
	K. Worley travel to Baltimore, MD to attend deposition of plaintiff Alla Averbukh - Airfare	639.90
Aug-26-11	Professional services rendered by LegaLink, Inc Witness Alla Averbukh	436.75
	Totals	\$1.524.38

Total Fee & Disbursements

\$15,745.96

Total amount claimed in Motion after disregarding 10% adjustment TAX ID Number 26-2022982 and \$322.33 Bacon invoice: \$17,003.80

Mr. James G. Derian

Name	TIMEKEEPER SUMMARY	Hours	Rate	Amount
		10000	500 PS 250	A MARK CE BERRY

05-44481-rdd Doc 21778-11 Filed 12/23/11 Entered 12/23/11 17:35:02 Exhibit K Pg 25 of 37

Invoice #: 2718	Page 9		September 1	2, 2011
David B. Weinstein		5.00	\$337.50	\$1,687.50
Katheryne Worley		41.30	\$337.50	\$13,938.75 1 ⁵ 7,6 ² 8,5 ⁵
Maggie Peroni		1:50	\$117.00	\$175.50

WEINSTEIN TIPPETTS & LITTLE LLP

7660 Woodway, Suite 500 Houston, TX 77063

Ph:(713) 244-0800

Fax:(713) 244-0801

)PH

Mr. James G. Derian October 10, 2011

Delphi Corporation
5825 Delphi Drive, M/C 483-400-554

Troy, MI
48098-2815

File #: 2012

ATTN: Mr. James G. Derian Final Bill Inv #: 2790

RE:

Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC,

et al.

DAYES	DESCRIPTION	HOURS	AMOUNT	TIMEKEEPER
Sep=01=11	Draft letter to B. Kuhlman concerning stay of discovery while bankruptcy motion is pending; memo to D. Weinstein concerning same; memo to D. Weinstein concerning document production in light of proposed discovery stay.	0.50	168.75	KRW
Sep-02-11	Memos and coordination concerning seeking stay of discovery from counsel for plaintiffs during pendency of bankruptcy dismissal motion; coordination concerning correspondence to plaintiffs' counsel.	0.30	101.25	KRW
Sep-07-11	Memos with A. Curtis regarding plans for deposition preparation week of 9/19/11.	0.20	67.50	DBW
	Conference with attorney K. Worley regarding plans for A. Curtis deposition preparation and strategy in light of plaintiffs' refusal to agree to discovery abatement in light of bankruptcy dismissal motion. Client memo regarding same.	0.30	101,25	DBW
	Memo to D. Weinstein concerning proposed stipulation for EDR download, bankruptcy stay, and additional future action items; memo to local counsel concerning status of motion	0.60	202.50	KRW

invoice #:	2790 Page 2	KORRI VI KIRISTA ALBISTA BARRAN ROLLES	Octob	er 10, 2011
	for non-sharing protective order; memo to local counsel concerning due date for plaintiffs' response to motion for non-shar protective order; conference with D. Weins concerning proposed stipulation for EDR download, proposing stipulation on discovidone under protest, and future action items	stein ery		
Sep-08-11	Coordination concerning deposition preparation for deposition of A. Curtis; me to counsel for GM/Enterprise concerning stipulation for EDR download.	0.50 mo	168.75	KRW
Sep-09-11	Memos with attorney K. Worley regarding preparation for A. Curtis deposition and en of client's proposed protective order. Revi and edit draft stipulation regarding Delphi waiving bankruptcy dismissal motion by participating in discovery here.	liý sw	135.00	DBW
	Correspondence to counsel for plaintiffs concerning downloading EDR module; dra stipulation concerning discovery stay; draft amended certificate of service for motion for non-sharing protective order; conference w. D. Weinstein concerning same; conference with local counsel concerning same; receipt and review of memo from J. Derian concerning stipulation for discovery stay.	or ith	15147450	KRW
Sep-12-11	Receipt and review of memo from plaintiffs counsel concerning scheduling deposition o GM representative on 9/22; memo to D. Weinstein concerning same; memo exchang with D. Weinstein concerning multiple scheduling matters.	T.	67.50	KRW
	Conference with attorney Worley; compile documents produced by Delphi for inclusion notebook for use at A. Curtis' deposition preparation meeting.		46.80	MPP
Sep-13-11	Memos with client and attorney K. Worley regarding attendance at proposed GM corporate representative deposition 9/22.	0.30	101,25	DBW
	Memo from D. Weinstein concerning scheduling deposition of GM representative.	0.20	67,50	KRW
	Compile documents and prepare binders	190	222.30	MPP

Invoice #:	2790	Page 3		Octob	er 10, 2011
		documents produced for reate detailed index.			
Sep-14-11	Counsel and cl September 22 deposition arra	ient memos regarding GM corporate representative ingements.	0.10	33.75	DBW
	Tippetts attend representative	Weinstein concerning D. ing deposition of GM corporate on 9/22; memo to all counsel illability to attend deposition on presentative.	0.30	101.25	KRW
	Conference will deposition of C	In D. Tippetts concerning IM representative.	0.20	67.50	KRW
Sep-15-11	regarding depo air bag sensor r review multipla	nd multiple conferences sition of GM representative on ecording and storage topics; memos regarding above; garding preparation for above	030	101.25	DBW
	materials prepa and status of su production; rev correspondence deposition prep sending to A. C. for GM concerr representative; Weinstein conc deposition of G memo from cou memo to D. We for deposition of	h A. Curtis concerning red for deposition preparation pplemental document iew document production to finalize materials for aration on 9/20 and coordinate surfis; conference with counselying deposition of GM memo to D. Tippetts and D. eming re-scheduling the M corporate representative; unsel for GM concerning same; binstein concerning available f GM representative as 18; memo to counsel for GM e.	1.30	438.75	KRW
		rdination concerning finalizing and to A. Curtis for Averbukh aration.	0,20	67,50	KRW
	M. Peroni conce and preparing m	emos, and coordination with eming documents produced aterials for deposition ference with D. Weinstein	0.60	202.50	KRW
	5) effects				

Invoice#:	-2790 Page 4		Octob	er 10, 2011
	Review list of documents produced and determine corresponding response to request for production; prepare index regarding same.	1.60	187.20	МРР
Sep-16-11	Conference with D. Weinstein concerning deposition of GM representative; arrangements for attending deposition preparation of A. Curtis on 9/20-9/21; memo to B. Frantangelo concerning producing EOL test data in color.	0.50	168.75	KRW
	Prepare boxes of documents and forward to A. Curtis in advance of deposition preparation meeting.	0.50	58.50	MPP
	Prepare notebook of discovery responses for attorney Weinstein and Worley's deposition preparation meeting with A. Curtis.	1.20	140,46	MPP
Sep-18-11	Staff and counsel memos regarding arrangements for deposition of Delphi's A. Curtis. Memos with attorney K. Worley and A. Curtis regarding preparation session scheduling and deposition scheduling.	0.40	135.00	DBW
Sep-19-11	Counsel memos regarding start time and arrangements for GM corporate representative deposition 10/6/11. Meeting with attorney K. Worley regarding agenda for deposition preparation of A. Curtis and strategy for same.	0.70	236.25	DBW
	Detailed file review and preparation of agenda and notes in advance of deposition preparation of Delphi engineer A. Curtis.	4.50	1,518.75	DBW
	Memos and coordination concerning attending deposition of A. Curtis on 9/27 in Indianapolis, Indiana; conference with D. Weinstein concerning preparation of A. Curtis for deposition.	0.40	135.00	krw
Sep-20-11	Deposition preparation in Kokomo with Delphi engineer A. Curtis and attorney K. Worley, and meeting with Delphi engineer D. Nunan regarding SDM download and evaluation from vehicle inspection. File notes regarding same. Client memo regarding same.	8.00	2,700.00	DBW
	Review documents produced in discovery for use in preparing A. Curtis for deposition scheduled on 9/27; all-day preparation session with A. Curtis for scheduled deposition on	8.00	NE	KRW

Invoice #: -

Page

October 10, 2011

9/27; review discovery responses to identify potential lines of questioning for deposition of A. Curtis; discuss potential questioning and strategy for deposition of A. Curtis; conferences with D. Weinstein concerning future strategy for deposition of A. Curfis and deposition of GM representative scheduled on October 6.

Sep-21-11

Second deposition preparation session in Kokomo with Delphi engineer A. Curtis and attorney K. Worley, File notes and client memo regarding same. Staff and client reports regarding same.

Preparation session of A. Curtis for deposition scheduled on 9/27; memos and coordination concerning production of End of Line testing data; draft checklist of future action items for supplementing discovery and obtaining non-sharing agreements prior to deposition of A. Curtis: receipt and conduct brief review of opposition to Delphi's bankruptcy dismissal motion; conference with D. Weinstein concerning same.

Sep-22-11

Conference with client regarding plans for A. Curtis deposition preparation and deposition on 9/27/11.

Conference with J. Derian regarding outcome of bankruptcy court hearing today on motion to dismiss and ramifications of same.

Conference with counsel for Alla Averbukh concerning signing confidentiality protective order prior to deposition of A. Curtis on 9/27; receipt and review of amended notice of deposition of GM representative; memo to J. Derian sending notice of deposition: conference with counsel for GM concerning case status and future action items: draft correspondence to counsel for Alla Averbukh concerning signing confidentiality agreement; review plaintiffs' response to Delphi's motion for non-sharing protective order; conference with D. Weinstein concerning dismissal of lawsuit following grant of bankruptcy dismissal motion; memo from J. Derian concerning same; conference with M. Peroni

8.00 2,700.00

8.00

DBW

DBW

N/C KRW

0.20 67.50 DBW

0.30 101.25

2.20 KRW

742.50

Invoice#:	2790 Page 6	organización estas actualismos	Octob	er 10, 2011
	concerning production of end of line test data; memo to D. Weinstein concerning same,			
	Prepare supplemental responses to request for production 59; prepare for service.	0.60	70.20	MPP
Sep-23-11.	Review plaintiffs' memo canceling A. Curtis deposition. Meeting with attorney K. Worley regarding effect of same and next steps. Review attorney Haffey memo regarding speaking today regarding bankruptcy order effect.	0.30	101.25	DBW
	Conference call with bankruptcy counsel and client regarding details of hearing yesterday resulting in court order to dismiss Maryland action. Further conference with client regarding same. Draft proposed email to plaintiffs counsel and send to J. Derian for review and comment.	0.70	236.25	DBW
	Memo to expert J. Pearson regarding dismissal status. Staff memos and file notes regarding same.	0.10	33.75	DBW
	Memo to J. Derian and A. Curtis sending notice of cancellation of deposition of A. Curtis received from counsel for plaintiffs' office; conference with D. Unrue, C. Haffey, J. Derian, and D. Weinstein concerning hearing on bankruptcy dismissal motion and discussing future action items for wrapping case up.	1.00	337.50	KRW
Sep-26-11	Counsel memos regarding bankruptcy dismissal order and effect on Delphi discovery obligations. Initial receipt and review of bankruptcy hearing transcript. Client memos regarding same. Review GM counsel letter to plaintiffs regarding supplying GM documents. Client memo regarding no need for same in light of bankruptcy rulings.	0.40	135.00	DBW
	Memo to counsel for GM/Enterprise concerning bankruptcy dismissal and cancellation of deposition of A. Curtis.	0.20	67.50	KRW
Sep-28-11.	Review and respond to attorney K. Worley memo regarding GM request for documents produced to plaintiffs before bankruptcy niling last week.	0.10	33.75	DBW

nvoice#:	-2790 Page 7	gara-198	Octi	ober 10, 2011
·	Memo from counsel for GM concerning supplemental document production; memo to D. Weinstein concerning same; draft return memo concerning same.	0.20	67.50	KRW
	Prepare and forward Delphi document 003699 to GM counsel.	0.20	23.40	MPP
	Totals 6	0.50	\$13,607.55	·
DISBURSEN	MENTS		∌r	
Sep-16-17	Digital prints by Copy Source One Ltd 3,698 digital blowbacks from CD		369.80	
Sep-19-11	D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer Andrew Curtis - Hotel 239.41 (150.93 +		239.41	
	88.48) D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer		246.42	
	Andrew Curtis - Rental Car D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer Andrew Curtis - Meals		17.33	
a".	D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer Andrew Curtis - Airport Parking			
	D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer Andrew Curtis – Airfare		691.90	(°
	Totals		\$1,601.86	<u> </u>
	Total Fce & Disbursements		•	\$15,209.41
(2) (2) (2) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4	Overpayment by Sedgwick on Invoice 2653		% 	= \$4.00
	Balance Due (10% deferred per incentive fee agre	emen	*	\$15,155.41 ** +11,770.92
	TOTAL DUE:			\$26,926.33

^{*}This payment is larger than the payment claimed in the Motion because it constitutes repayment of the 10% reductions applied on not only the invoices at issue in this Motion, but also earlier invoices.

TAXID Number

Min James G. Derian

Accordingly, for purposes of the Motion, the 10% deferred payment on each invoice was simply disregarded so that the actual amounts the Reorganized Debtors ultimately paid on account of each invoice is properly reflected.

**This is the total amount claimed in the Motion.

Invoice#; 2790	Page 8			October	10, 2011
Name	TIMEKEEPER SUMMARY	s	Hours	Rate	Amount
David B. Weinstein		25.30	\$337		\$8,538.75
Katheryne R. Worley	· ·	2.80	\$337	.50	\$4,320.00
Katheryne R. Worley	i	6.00	\$ 00).00	No Charge
Maggie P. Peroni		6.40	\$117		\$ 748.80

Sodawick Offi

WEINSTEIN TIPPETTS & LITTLE LLP

7660 Woodway, Suite 500 Houston, TX 77063

Ph:(713) 244-0800

Fax:(713) 244-0801

Mr. James Derian November 3, 2011

Delphi Corporation

5825 Delphi Drive, M/C 483-400-554

Troy, MI

48098-2815

File #: 2012

ATTN: Mr. James Derian Inv #: 2856

RE:

Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC,

et al.

DATE	DESCRIPTION	HOURS	AMOUNT	TIMEKEEPER
Oct-03-11	Memos with J. Derian confirming no Delphi attendance at GM corporate representative deposition October 6. Conference with attorney K. Worley regarding same. Draft proposed memo to all counsel regarding Delphi not appearing at October 6 GM deposition and send to client for approval and comment.	0.40	135.00	DBW
	Memo to counsel for A. Averbukh concerning signing protective order in advance of deposition of GM representative.	0.20	67.50	KRW
Oct-04-11	Finalize and send email to all counsel regarding Delphi not appearing at GM deposition and restrictions on use of Delphi confidential documents. Client and staff memos regarding same. Review Butzel Long proposed order on bankruptcy dismissal rulings.	0.40	135.00	DBW
Oct-05-11	Review and respond to attorney K. Worley memo regarding failure of Alla Averbukh counsel to sign confidentiality agreement in advance of GM corporate representative deposition.	0.10	33.75	DBW

Invoice#:	2856	Page	2		November 3, 20	
	Averbukl draft corr	ice with counsel for def h concerning protective respondence to counsel h concerning same.	order issues,	0.50	168.75	KRW
Oct-06-11	dismissal	plaintiffs' proposed mot Memos with attorney insuring same complic	K. Worley	0.20	67.50	DBW
	stipulatio to D. Wei	nd review of proposed n from counsel for plai instein concerning strat dismissal.	ntiffs; memo	0.20	67,50	KRW
Oct-07-11	concernio and revie concernio review/re counsel; r same; me	ce with counsel for A. Ig protective order mati w of memo from local Ig proposed dismissal f vise dismissal and retu nemo from local couns mo to J. Derian sendin n of dismissal.	ters; receipt counsel rom plaintiffs; ru to local sel concerning	1.00	337.50	KRW
Oct-10-11		ankruptey judge's 10/4 Client memo regardir		0.10	31,75	DBW
	Derian ap dismissal;	nd review of correspon proving red-lined stipu , memo to counsel for p evised stipulated dismin	lated plaintiffs	0.20	67.50	KRW
Oct-11-11		local counsel concernic stipulation for plaintiff		0.20	67.50	KRW
Oct-14-11	dismissal	D. Weinstein concerning stipulation; conference concerning same.		0.20	67.50	KRW
Oct-17-11		idence to local counsel stipulation proposed by		0.20	67.50	KRW
Oct-18-11	counsel co claims in l dismissal : original co stipulation	nd review of memo from oncerning plaintiff A. A lawsuit and plaintiffs'; stipulation; return memomplaint for use in fina of dismissal; memo to oncerning dismissal stip	cyerbukh's proposed to sending lizing plaintiffs'	0.60	202-50	KRW

Invoice #:	2856	Page 3	November 3, 201		
Oct-19-11		ndence to counsel for plaintiffs og issues with dismissal stipulation.	0.10	33.75	KRW
Oct-24-11		ce with J. Derian concerning status of order; return memos concerning	0.20	67.50	KRW
Oct-25-11	understan include A Conference Conference same, Co counsel K to all cour dismissal clarificatio Averbukh counsel re stipulation	lient memos regarding need to d plaintiffs' counsel refusal to . Averbukh on dismissal stipulation. Le with J. Derian regarding same. Le with attorney K. Worley regarding inference with A. Averbukh personal . Mallahan regarding same. Memo isel regarding need to finalize and requesting plaintiffs' on on refusal to include A Numerous further memos with garding separate dismissal as agreed to for A. Averbukh and ly members. Client reports same.	0.80	270.00	DBW
	counsel re	emos and replies with plaintiffs garding A. Averbukh inclusion on dismissal. Client memos regarding	0.40	135.00	DBW
Oct-28-11	forwarding	and coordination regarding plaintiff's signed stipulation of o attorneys Weinstein and Worley handling.	0.10	11.70	MPP
Oct-30-11	non-sharin	Weinstein concerning obtaining g agreement from A. Averbukh's rior to deposition of GM ive.	0.20	67.50	KRW
Qet-31-11	A. Averbu	vised dismissal stipulation sent from kh's personal attorney. Memos with garding acceptability of same.	0.10	33.75	DBW
	Totals	<i>छ</i>	6.40	\$2,137.95	
DISBURSEN	IENTS				
Sep-02-11		il services rendered by Bacon, & Palmer, L.L.P.		647,42	
Sep-22-11		very 09/19/11 A. Curtis - Delphi	·	105/23	,

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Invoice #:	2856	Page 4	November 3, 2011
	FedEx Del	ivery 09/16/11 A. Curtis - Delphi & Safety	186.50
Oct-06-11	Profession	nl services rendered by Bacon, ε Palmer, L.L.P.	23758
	Totals		\$1,176,73
	Total Fee	& Disbursements *	\$3,314.68

TAX ID Number

26-2022982

Mr. James Derian

Name	TIMEKEEPER SUMMARY	Hours	Rate Amount	
	1.	CETTO AN ALLES TO LIEU TO A THE		
David B. Weinstein	2.50	\$337.2	50 \$843.75	יי לישלט איני
Katheryne Worley	2.80	\$337.5		
Maggie Peroni	0.10	STIPAC	0 \$11.70	

Total amount claimed in Motion after subtracting \$885 for Bacon invoices: \$2,429.68